

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:15CR184
v.	§	Judge Crone
	§	
LOUIS E. RICHARDSON, JR.	§	

ELEMENTS OF THE OFFENSE

The defendant, **Louis E. Richardson, Jr. (Richardson)**, is charged in Count One of the Indictment with violating 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2) (possession and attempted possession of child pornography). The elements of the offense that the government must prove beyond a reasonable doubt, but that **Richardson** would admit if his plea is accepted, are:

1. The defendant knowingly possessed material that contained an image of child pornography;
2. Such child pornography involved a prepubescent minor or a minor who had not attained 12 years of age.
3. Such child pornography had been mailed, had been shipped or transported using any means or facility of interstate or foreign commerce; had been shipped or transported in or affecting interstate or foreign commerce; and/or had been produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce, including by computer; and
4. The defendant knew that such items contained child pornography which involved a prepubescent minor or a minor who had not attained 12 years of age.

Respectfully submitted,

JOHN M. BALES
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/s/

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served by electronic filing to opposing counsel on March 18, 2016.

/s/

Marisa J. Miller